REMARKS/ARGUMENTS

1.)   Claim Rejections – 35 U.S.C. § 103(a)

The Examiner rejected claims 1-4, 6-15 and 17-19 under 35 U.S.C. § 103(a) as being unpatentable over Arroyo, et al. (US 2003/0221024) in view of Jacobson (US 7,020,598). Applicants respectfully traverse the rejection. Set forth below are the two independent claims of the present application, 1 and 12, with the references cited by the Examiner and Applicants' comments in brackets.

1. A platform system comprising:

a software services component comprising at least one functional software unit;

[Examiner cites Arroyo Fig. 2, item 40. The Examiner also equates element 60, the middleware, to the software services component. However, Arroyo does not discuss the functionality of middleware element 60. The middleware element 60 of Arroyo is not equivalent to the software services component.]

a hardware component comprising at least one hardware unit associated with the at least one functional software unit;

[Examiner cites Arroyo page 2, [0023]. Arroyo does not disclose whether or how items 40 and 60 are associated with the hardware of items 140, 150, 160, 170, 180, and 190 therein. Hence, the cited passages of Arroyo do not disclose this aspect of Applicants' claimed invention]

a software interface component comprising at least one software interface;

[Examiner cites Arroyo page 2, [0023]. However, this portion of Arroyo does not disclose a software interface component comprising at least one software interface.]

the software interface component being adapted to provide access by a mobile-terminal application software for testing the mobile terminal to the software services component and the hardware component during testing of a mobile terminal and during a lifecycle of the mobile terminal;

[Examiner cites Jacobson col. 12, lines 44-53; and col. 15, lines 1-14. Clearly, the Arroyo software interface does not refer to, and thus is not adapted to provide access to a mobile terminal application software by the application 40 or middleware 60 of Arroyo (equated by the Examiner to be the software services component). Further, Jacobsen col. 12, lines 44-53 does not disclose the foregoing element. Jacobson col. 15, lines 1-14 discloses a diagnostic control software, that, along with a diagnostic microcontroller, performs HW and SW diagnostics and reconfiguration--but it does not disclose which software interface component that facilitates access to the DUT. Further, Arroyo, not Jacobson, is cited for having the software interface component. As a result, even assuming the existence of these separate elements in each of Arroyo and Jacobson, it is not technically possible to combine Arroyo and Jacobson to obtain the present invention as both must be in the same reference to be workable.]

the software interface component being adapted to isolate the hardware component and software services component from user applications; and

[Examiner cites Arroyo page 2, [0023] and Fig. 2, items 40, 60, 110, 130. In the present invention, the software interface component is adapted to isolate the hardware from the software so that access for testing can be performed. These isolation characteristics are not disclosed in Jacobson, nor is isolation referred to in Arroyo [0023].]

wherein a code space occupied by the mobile-terminal application software may be overwritten after the testing of the mobile terminal has been completed.

[Examiner cites Jacobson col.13, lines 4-14 for this element, but Jacobson does not disclose a code space occupied by the mobile-terminal application software may be overwritten after the testing of the mobile terminal has been completed.]

Claim 12 provides as follows:

12. A method of testing a mobile terminal, the method comprising:

providing in the mobile terminal a software interface component having at least one software interface;

[Examiner cites Arroyo Fig. 2, item 40. The Examiner also equates element 60, the middleware, to the software services component. However, Arroyo does not discuss the functionality of middleware element 60. The middleware element 60 is not equivalent to the software services component]

the software interface component adapted to isolate software service components and hardware components of the mobile terminal from user application software;

[Examiner cites the middleware of Arroyo at page 2, [0023]. However, there is no discussion in Arroyo of the interactions among items 40, 60 110 and 130, and thus isolation characteristics are not disclosed nor implied by Arroyo.]

interoperably connecting the mobile terminal to a test system;

[Examiner cites Jacobson col. 2, lines 17-29.]

providing, via the interface component, of access by a mobile-terminal-test application software to the software and hardware of the mobile terminal during testing of the mobile terminal;

[Examiner cites Jacobson col. 12, lines 44-53, col. 15, lines 1-14. Jacobson col. 15, lines 1-14 discloses a diagnostic control software, that, along with a diagnostic microcontroller, performs HW and SW diagnostics and reconfiguration--but it does not disclose a software interface component that facilitates access to the DUT. Further, Arroyo, not Jacobson, is cited for having the software interface component. As a result, Arroyo and Jacobson can not be combined to obtain the present invention.]

controlling, by the test system, the mobile-terminal-test application software via an external interface during the testing of the mobile terminal;

[Examiner cites Jacobson col. 2, lines 17-29.]

retaining the software interface component, the hardware, and the software on the mobile terminal; and

deleting the mobile-terminal-test-application software from the mobile terminal.

[The Examiner cites Jacobson col. 12, lines 43-67; col. 13, lines 1-14, however, neither of these elements are disclosed by Jacobson.]

In view of the foregoing remarks, the Applicants believe all of the claims 1-4, 6-15 and 17-19 currently pending in the Application to be in a condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 1-4, 6-15 and 17-19.

2.)   Prior Art Not Relied Upon

In paragraph 4 of the Office Action, the Examiner stated that the prior art made of record and not relied upon is considered pertinent to the Applicants' disclosure. None of the cited references disclose or suggest the present invention.

CONCLUSION

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in a condition for allowance. The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

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